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DOCKET NO. 49795
SOAH DOCKET NO. 473-20-1118



COMPLAINT OF PETTY GROUP, LLP §
AGAINST RIO GRANDE ELECTRIC §
COOPERATIVE, INC. §

BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

**RIO GRANDE ELECTRIC COOPERATIVE INC.'S RESPONSES TO PETTY GROUP,
LLC'S SIXTH RFIS**

TO: Petty Group, LLP, by and through their attorneys of record, Meghan Griffiths,
Jackson Walker LLP, 1200 Congress Avenue, Suite 1100, Austin, Texas 78701.

COMES NOW, Rio Grande Electric Cooperative, Inc. ("RGEC"), by and through their
attorneys of record, and files these responses to Petty Group, LLP's Sixth Set of Requests for
Information. RGEC stipulates that these responses may be treated as if filed under oath.

Respectfully submitted,

Shea & Associates

By: /s/ Tammy Shea

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**ATTORNEYS FOR RIO GRANDE
ELECTRIC COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be served on all parties of record on
May 12, 2020 in accordance with the Commission requirements for electronic service.

/s/ Tammy Shea
Tammy Shea

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 6-1 If not provided with your direct testimony in this case, please provide, in native format, all workpapers and documents related to the testimony of each witness filing testimony on your behalf in this proceeding.

REQUESTED BY: Petty Group, LLP

RESPONSE:

RGEC is in the process of compiling this information and will supplement. However, see generally, attached communications for David Mueller and Danny Wells and the attachments to their Direct Testimony. See also the depositions of Rogelio Andrade, Amber Conrad, Gerry Delfin, Mark Byrom, Javier Solis, Robert Grubb, Gabriel Marquez, Nathan Morgan, Kyle Haley, and Larry Gurley. See also Petty's direct testimony in this proceeding. RGEC is still compiling additional information and will supplement this response.

**DOCUMENTS RESPONSIVE TO THIS REQUEST ARE CONSIDERED
CONFIDENTIAL UNDER THE PROTECTIVE ORDER ISSUED IN THIS
CASE.**

SPONSOR:

Roger Andrade, Danny Wells, Amber Conrad, David Mueller

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 6-2 For each testifying expert that has provided testimony for you in this case, please provide (to the extent not provided earlier):

- (a) A list of all cases in which the testifying expert has submitted testimony, from 2015 to the present;
- (b) Copies of all prior testimony, articles, speeches, published materials and peer review materials written by the testifying expert, from 2015 to the present;
- (c) The testifying expert's billing rate for this proceeding; and
- (d) All documents and communications, including email correspondence, provided to, reviewed by, or prepared by or for the testifying expert in anticipation of the testifying expert filing testimony in this proceeding.

REQUESTED BY: Petty Group, LLP

RESPONSE:

- (a) RGEC is in the process of compiling this information and will supplement.
- (b) RGEC has objected to this RFI.
- (c) See attached engagement letters.
- (d) See attached communications for David Mueller and Danny Wells and the attachments to their Direct Testimony. See also the depositions of Rogelio Andrade, Amber Conrad, Gerry Delfin, Mark Byrom, Javier Solis, Robert Grubb, Gabriel Marquez, Nathan Morgan, Kyle Haley, and Larry Gurley. RGEC is still compiling additional information and will supplement this response.

**DOCUMENTS RESPONSIVE TO THIS REQUEST ARE CONSIDERED
CONFIDENTIAL UNDER THE PROTECTIVE ORDER ISSUED IN THIS
CASE.**

SPONSOR:

Roger Andrade, Danny Wells, Amber Conrad, David Mueller

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 6-3 For each consulting expert whose mental impressions or opinions have been reviewed by one or more testifying experts, please provide (to the extent not provided earlier):

- (e) A list of all cases in which the consulting expert has submitted testimony, from 2015 to the present;
- (f) Copies of all prior testimony, articles, speeches, published materials and peer review materials written by the consulting expert, from 2015 to the present;
- (g) The consulting expert's billing rate for this proceeding; and
- (h) All documents and communications, including email correspondence, provided to, reviewed by, or prepared by or for the consulting expert in anticipation of the testifying expert filing testimony in this proceeding.

REQUESTED BY: Petty Group, LLP

RESPONSE:

RGEC did not retain any consulting experts for this case.

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 6-9 Please admit or deny whether RGEC tested the site(s) owned or operated by [REDACTED] that requested service from RGEC for compliance with Institute of Electrical Engineers (“IEEE”) Standard 519 before energization of the load or at any point between 2010 to the present. If admit, please provide the specific date the testing was performed for each site.

REQUESTED BY: Petty Group, LLP

RESPONSE:

RGEC has tested these sites numerous times. See Exhibit B to the Direct Testimony of Amber Conrad and Exhibit 39 to the deposition of Rogelio Andrade. See also Exhibit 34 to the deposition of Amber Conrad.

**DOCUMENTS RESPONSIVE TO THIS REQUEST ARE CONSIDERED
CONFIDENTIAL UNDER THE PROTECTIVE ORDER ISSUED IN THIS
CASE.**

SPONSOR:

Roger Andrade, Amber Conrad, Conrad Dalton

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 6-10 Please admit or deny whether RGEC tested the site(s) owned or operated by [REDACTED] that requested service from RGEC for compliance with Institute of Electrical Engineers (“IEEE”) Standard 519 before energization of the load or at any point between 2010 to the present. If admit, please provide the specific date the testing was performed for each site.

REQUESTED BY: Petty Group, LLP

RESPONSE:

RGEC has tested these sites numerous times. See Exhibit B to the Direct Testimony of Amber Conrad and Exhibit 39 to the deposition of Rogelio Andrade. See also Exhibit 34 to the deposition of Amber Conrad.

**DOCUMENTS RESPONSIVE TO THIS REQUEST ARE CONSIDERED
CONFIDENTIAL UNDER THE PROTECTIVE ORDER ISSUED IN THIS
CASE.**

SPONSOR:

Roger Andrade, Amber Conrad, Conrad Dalton

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 6-11 Please admit or deny whether RGEC tested the site(s) owned or operated by [REDACTED] that requested service from RGEC for compliance with Institute of Electrical Engineers (“IEEE”) Standard 519 before energization of the load or at any point between 2010 to the present. If admit, please provide the specific date the testing was performed for each site.

REQUESTED BY: Petty Group, LLP

RESPONSE:

RGEC has tested these sites numerous times. See Exhibit B to the Direct Testimony of Amber Conrad and Exhibit 39 to the deposition of Rogelio Andrade. See also Exhibit 34 to the deposition of Amber Conrad.

SPONSOR:

Roger Andrade, Amber Conrad, Conrad Dalton

PUBLIC UTILITY COMMISSION OF TEXAS

PUC NO. 49795
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COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Please admit or deny whether RGEC tested the site(s) owned or operated by [REDACTED] that requested service from RGEC for compliance with Institute of Electrical Engineers (“IEEE”) Standard 519 before energization of the load or at any point between 2010 to the present. If admit, please provide the specific date the testing was performed for each site.

REQUESTED BY: Petty Group, LLP

RESPONSE:

RGEC has tested these sites numerous times. See Exhibit B to the Direct Testimony of Amber Conrad and Exhibit 39 to the deposition of Rogelio Andrade. See also Exhibit 34 to the deposition of Amber Conrad.

SPONSOR:

Roger Andrade, Amber Conrad, Conrad Dalton

PUBLIC UTILITY COMMISSION OF TEXAS

PUC NO. 49795
SOAH DOCKET NO. 473-20-1118

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 6-13 Please admit or deny whether RGEC verified the installation of harmonic filters upon energization for any of the following parties: [REDACTED]

[REDACTED]. This request applies to each site or property served by RGEC for the listed parties. If admit, provide the specific date when verification was done for each site.

REQUESTED BY: Petty Group, LLP

RESPONSE:

RGEC has tested these sites numerous times upon re-energization after testing or installation of filters. See Exhibit B to the Direct Testimony of Amber Conrad and Exhibit 39 to the deposition of Rogelio Andrade. See also Exhibit 34 to the deposition of Amber Conrad.

SPONSOR:

Roger Andrade, Amber Conrad, Conrad Dalton